

American Society for Deaf Children RECEIVED

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MAR 15 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

March 15, 1996

Secretary
Federal Communications Commission
1919 M Street NW
Washington, DC 20554

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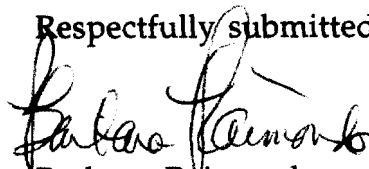
Dear Mr. Secretary:

The American Society for Deaf Children is pleased to submit an original and four copies of our comments on the Commission's Notice of Inquiry on Closed Captioning and Video Description (FCC 95-484).

The American Society for Deaf Children is a parent run organization providing information and support to families with deaf or hard of hearing children. We advocate for deaf and hard of hearing children's total quality participation in education, the family, and the community. We support the competent use of signing and recognize and respect deaf culture as critical for enhancing and broadening the social, personal, and educational aspects of deaf and hard of hearing children's lives.

CAN thanks the Commission for the opportunity to comment on this important issue and for its commitment to making access to telecommunications services a reality for all Americans.

Respectfully submitted,



Barbara Raimondo
Board Member

Enclosures

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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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OFFICE OF SECRETARY

In the Matter of)
)
Closed Captioning and Video) CC Docket No. 95-176
Description of Video Programming)

**Comments of
the American Society for Deaf Children**

Introduction

The American Society for Deaf Children submits these comments to the Federal Communications Commission's Notice of Inquiry on closed captioning and video description (FCC 95-484). The American Society for Deaf Children supports the comments of the Consumer Action Network, the National Association of the Deaf, and Telecommunications for the Deaf, Inc. We thank the FCC for its commitment to telecommunications access for all people and for the opportunity to comment on this issue.

The American Society for Deaf Children is a parent run organization providing information and support to families with deaf or hard of hearing children. We advocate for deaf and hard of hearing children's total quality participation in education, the family, and the community. We support the competent use of signing and recognize and respect deaf culture as critical for enhancing and broadening the social, personal, and educational aspects of deaf and hard of hearing children's lives.

We have longstanding relationships with many national organizations addressing issues facing deaf and hard of hearing Americans, including the National Association of the Deaf and Telecommunications for the Deaf, Inc., and we are a founding member of the Consumer Action Network.

Paragraph 11. Nature and Importance of Captioning

As the Commission points out, television plays a dominant role in our society. Americans depend on television for news, information, and entertainment. However, as hearing people derive little or no benefit from watching television with the volume off, deaf or hard of hearing persons derive little or no benefit from watching a program with no captions. Captioning is to deaf and hard of hearing people what sound is to hearing individuals.

At the American Society for Deaf Children, we have witnessed firsthand the difference captioning has made in our children's lives. It allows them to learn about and better understand the world around them. News, documentaries, and other educational programs give them information in an accessible format. While books, newspapers, and magazines are critical sources of information, captioned video programming offers vivid imagery unavailable through traditional forms of print.

Captioning is a necessity in school, where teachers rely more and more on video programs and computer networks to impart information. Captioning helps ensure that deaf and hard of hearing children have functionally equivalent access to information as their hearing schoolmates. As parents we have the same academic expectations - and later, employment expectations - for our deaf and hard of hearing children as we do for our hearing children. It is essential that they receive functionally equivalent information.

Because of captioning, our children have had access to the same programs as their hearing peers. Programs that have become part of the popular culture - "Mr. Rogers' Neighborhood," "The Magic School Bus," and "Where in the World is Carmen San Diego?" - are also part of our children's lives. Our children can enjoy and learn from these shows in the same way that hearing children can.

Paragraph 12. Nature and Extent of Potential Benefits

Research and anecdotal evidence shows that captioning can help improve reading levels in several populations: individuals learning English as a second language, beginning readers, illiterate adults, remedial readers, and deaf and hard of hearing learners. It is also beneficial for reasons of convenience, such as for use in noisy areas like airport terminals or quiet ones such as homes or offices.

Access alone is an important reason to require captioning. But we are pleased that captioning can improve the reading levels of our children and provides exposure to written English. Because deaf children cannot hear spoken English, they learn it primarily through reading and writing. With captioning, they can see verb forms, word endings, plurals, and other grammatical information. They can read idioms, slang, and different registers of speech, such as the kind of speech used in the narration of a documentary versus the kind used in everyday dialogue among hearing children. With captioning, watching any program can be educational.

Further, captions can help motivate deaf and hard of hearing children to read. If they want to know what is happening on television, they need to read the captions. They can guess at words they don't already know and make

predictions about what will happen next. They can do this in the nonthreatening environment of their home. Hearing children can benefit from captioning as well. Many of our members report that their hearing children are reading at an advanced level due to repeated exposure to captioned material.

Captioning allows our children a measure of independence. Most of our families have one deaf or hard of hearing child, with hearing siblings. Programming that is captioned allows deaf or hard of hearing children to watch television on their own, without needing hearing siblings or parents to interpret the program. It allows family members to function in their regular family roles.

Other family members appreciate captioning when they want a quiet environment, such as if a child is napping, or when the environment is too noisy to hear the television well, such as when noisy appliances are running.

Paragraph 14. Availability of Closed Captioning of Television Video Programming

Currently all prime time and network children's programming is captioned, but we are disappointed by the low rate of captioning on cable. While most of the Disney Channel's programming is captioned, very little on the Discovery Channel is. While we are pleased that Nickelodeon captioned its "Help-a-Thon" (an effort to encourage children to volunteer in their communities) programming last year, in general the level of captioning on Nickelodeon is low.

Paragraph 31. Types of Programs for which it is Impractical or Unnecessary to Provide Closed Captioning

There are no particular types of programs for which it is either impractical or unnecessary to provide captioning. Even programs with very little audio must be captioned so the viewer is aware of what that audio information is.

Paragraph 33. Accuracy of Closed Captioning on Television Programming

We are pleased to see that the amount of captioned television has increased over the years. However, problems remain. Many audio segments are not captioned at all, and often captions are stripped or garbled. Although all network prime time programming is captioned, many spots during that time are not. These include previews for the show about to be aired, recaps of previous episodes, coming attractions, and information provided during station breaks. Further, open character generated announcements on such important information as election results, emergency warnings, school

closings, and weather advisories are obscured. Care must be taken to ensure that one type of captioning does not obscure another type.

Captions are often stripped when the program goes from one provider to another. For example, if a prime time program with high quality captioning goes into syndication, often the film needs to be edited to fit into a smaller time frame. Although the visual scenes and the auditory track remain intact, editing parts of the film can remove captioning. Therefore the captioning needs to be reformatted every time it is edited. Editing is quite common. One program can go from the movie theater to premium cable to home video to syndication to basic cable or local stations. If editing occurs each step of the way, much of the captioning can be stripped by the time the program reaches its final destination. Each provider each step of the way must take steps to ensure that reformatting is done so that the captions remain intact.

Sometimes captions are stripped when the signal from the cable or broadcast network point of origin passes through a local provider. This results from an engineering monitoring error at the local provider.

Captioning needs to be thought of as integral to video programming. It needs to be part of the production process the same way sound is. When it is treated as essential, these problems will be reduced.

Paragraph 34. Transition

We support the target of 100 percent of programs captioned subject to the undue burden limitation, but recognize that this goal will not be met immediately. The Commission should first ensure that programs that were previously aired with captions be reformatted and displayed with captions upon the effective date of its rules. The Commission should require premium cable stations to caption 100 percent of their programming within 90 days of the effective date of their rules. This should apply to programs exhibited before the effective date of the rules and after alike. The Commission should require captioning for other video programming first published or exhibited after the effective date of its regulations within six months to two years after the effective date of the Commission's rules.

Conclusion

The American Society for Deaf Children thanks the FCC for the opportunity to comment on the captioning of video programming. In addition to our own comments, we support the comments made by the Consumer Action Network, the National Association of the Deaf, and Telecommunications for the Deaf, Inc. We look forward to the opening of the "information superhighway" and the part it will play in our children's future. We applaud

the FCC's commitment to making access to telecommunications services a reality for all Americans.

Respectfully submitted,

A handwritten signature in cursive script, reading "Barbara Raimondo".

Barbara Raimondo
Board Member
American Society for Deaf Children

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